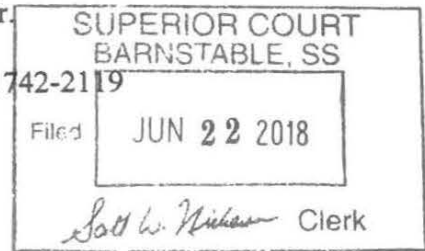


Emory G. Snell Jr.
965 Elm St.
Concord, MA 01742-2119

June 19, 2018



Donald S. Bronstein
Senior Staff Counsel
Committee for Public Counsel Services
Private Counsel Appeals Unit
44 Bromfield Street
Boston, MA 02108
dbronstein@publiccounsel.net

Re: CPCS Funding of Experts - COMMONWEALTH v. EMORY G. SNELL JR., 9572CR46579

Dear Mr. Bronstein:

As you well know, in 1999 you were mistakenly advised by Attorney John J. Barter that there were no merits to assign counsel for a Rule 30. That conclusion has now been unassailably disproved. In August 2013 Judge Christopher Muse deemed me indigent so that I could secure funds from the CPCS Innocence Program to further my actual innocence. In that regard, CPCS paid out more than \$8000 to former NY medical examiner Dr. Michael Baden. On April 23, 2015 Dr. Baden, by a reasonable medical certainty conclusion, determined that my late wife Elizabeth succumbed to a fatal natural cardiac arrhythmia. Dr. Baden joins four prior academic/forensic pathologists who were retained and paid independently to ascertain that the autopsy performed by William Zane was fatally flawed, and there was no scientific and/or forensic medical evidence to support an asphyxial death.

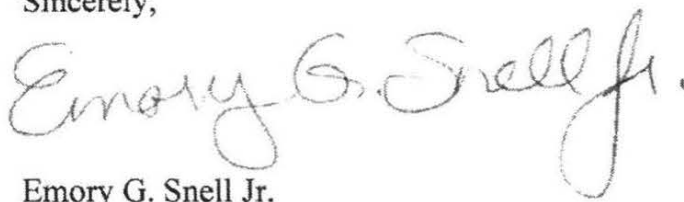
On June 12, 2018, Judge Muse held a status hearing on the December 2017 Rule 30 filed by Attorney Richard Shea. Due to Judge Muse's pending retirement, another hearing is scheduled for July 10, 2018. It is my contention that Judge Muse is going to seek a replacement jurist to take over my case in hopes that several of my forensic specialists who have provided affidavits be scheduled to testify. In that regard, I've spoken with Attorney Shea, who informs me that like the trial Judge in 1995 who forced me to become indigent and denied me my considerable funds to defend myself, CPCS is going to restrict me from funding my experts' appearance to testify to their findings.

Accordingly, in writing to you, I specifically request that CPCS fund the expenses associated for the testimony of Dr. Michael Baden from his place of business in New York City, NY; as well as Dr. Thomas Young, whose business is in Kansas City, Missouri. Although both experts and the three others have come to similar conclusions, Dr.'s Baden and Young are required because their conclusions were arrived at from different aspects of the autopsy. To support my need of the presence of Dr.'s Baden and Young, I would ask that you contact Attorney Shea so that you might secure copies of each affidavit and those comprehensive scientific/medical autopsy findings.

In sum, for the last 23 years I have strongly protested my actual innocence. It wasn't until 2015 that CPCS lately joined the crusade to vindicate yet another MA citizen unconstitutionally convicted. Notwithstanding our past differences, I ask that you provide the financial support, whereas for nearly two decades, through private funding, I have proven that there has been a substantial miscarriage of justice.

I close, thanking you in advance.

Sincerely,

A handwritten signature in cursive script that reads "Emory G. Snell Jr." The signature is written in dark ink and is positioned to the right of the typed name.

Emory G. Snell Jr.

cc: Judge Christopher Muse, Barnstable Superior Court
Richard J. Shea, Esq.



WILLIAM J. LEAHY
CHIEF COUNSEL

Commonwealth of Massachusetts
Committee for Public Counsel Services
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PATRICIA A. WYNN
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PRIVATE COUNSEL DIVISION

ANDREW SILVERMAN
DEPUTY CHIEF COUNSEL
PUBLIC DEFENDER DIVISION

WRITER'S DIRECT DIAL NUMBER

September 29, 1999

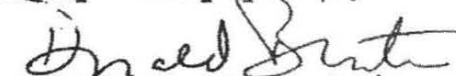
Emory G. Snell, Jr.
P.O. Box 8000
Shirley, MA 01464

Dear Mr. Snell:

Your letter of August 20, 1999 was referred to me today by Leslie Walker, who informs me that she never received your earlier letter. Please be advised that I discussed your case with your attorney, Jay Barter, in August. Mr. Barter and I agreed at that time that there were no meritorious issues which could be raised in a new trial motion. Accordingly, since there is no automatic right to counsel in connection with a motion for new trial, CPCS will not assign counsel.

I am sorry that we are unable to provide further assistance to you in this matter.

Very truly yours,


Donald S. Bronstein
Supervising Appellate Counsel
Private Counsel Division